

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO.: 04-
v.	:	DATE FILED:
MARTIN JAIMES LOPEZ	:	VIOLATIONS:
JONATHAN RODRIGUEZ	:	8 U.S.C. § 1324(a)(1)(A)(ii) (Alien
	:	smuggling – 2 Counts).
	:	
	:	

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. Defendants MARTIN JAIMES LOPEZ and JONATHAN RODRIGUEZ participated in a scheme to transport approximately 11 illegal aliens, who were citizens of various countries in Central America, from Houston, Texas, to, among other places, Norristown, Pennsylvania.

2. On or about February 3, 2004, defendants MARTIN JAIMES LOPEZ and JONATHAN RODRIGUEZ transported approximately 11 illegal aliens in a van owned by RODRIGUEZ to Norristown, Pennsylvania.

3. On or about February 3, 2004, at Norristown, in the Eastern District of Pennsylvania and elsewhere, defendants

MARTIN JAIMES LOPEZ
and

JONATHAN RODRIGUEZ

knowing or in reckless disregard of the fact that an alien has come to, entered, or remained in the United States in violation of law, transported or moved or attempted to transport or move such alien, that is, E.C., an individual known to the grand jury, within the United States by means of transportation or otherwise for commercial advantage or private financial gain, in furtherance of such violation of law.

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (a)(1)(B)(i).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs one and two of Count One are incorporated by reference.
2. On or about February 3, 2004, at Norristown, in the Eastern District of Pennsylvania and elsewhere, defendant

MARTIN JAIMES LOPEZ

knowing or in reckless disregard of the fact that an alien has come to, entered, or remained in the United States in violation of law, transported or moved or attempted to transport or move such alien, that is, S.B., an individual known to the grand jury, within the United States by means of transportation or otherwise for commercial advantage or private financial gain, in furtherance of such violation of law.

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) .

NOTICE OF FORFEITURE

1. As a result of the violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (a)(1)(B)(i), set forth in Counts One and Two of this Indictment, defendants

MARTIN JAIMES LOPEZ
and
JONATHAN RODRIGUEZ

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses, as charged in this Information, including, but not limited to \$1,476 in United States Currency recovered from defendant MARTIN JAIMES LOPEZ on or about February 3, 2004 and a white Ford van seized from defendant JONATHAN RODRIGUEZ on or about February 3, 2004;

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 8, United States Code, Section 1324(b).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney